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SAN FRANCISCO WATER DEPARTMENT

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WATER CONSERVATION PROGRAM

April 23, 1991



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I. PROGRAM DESCRIPTION

A. WATER SUPPLY SITUATION

The Hetch Hetchy Water and Power System provides between 80 and 85 percent of the water used in the San Francisco Water Department (SFWD) and Hetch Hetchy service areas. It is experiencing a fifth consecutive dry year. Total system storage is at 30 percent of capacity as of April 8, 1991. In the absence of additional runoff, this storage would be exhausted in approximately 18 months at current consumption rates.

As a result of considerable precipitation and accumulation of snow in the Hetch Hetchy watershed, this picture is expected to improve with the completion of this year's runoff. Current estimates of runoff range from 100,000 acre feet to 400,000 acre feet. For purposes of planning the recommended rationing program, 150,000 acre feet is assumed.

Additionally, two successful water transfers have been accomplished, resulting in the current transfer of 7,500 acre feet from the Placer County Water Agency and 4,900 acre feet of surplus groundwater from the Modesto Irrigation District. Both transfers were made possible through the use of the State Water Project as a transport facility, ultimately allowing for the water to enter the San Francisco Water Department system at the South Bay Aqueduct turnout which was constructed under contract to the State Department of Water Resources and completed in December, 1990.

This turnout has a capacity in normal years of 20,000 acre feet per annum, and up to 50,000 acre feet in dry years. To meet additional supply needs, the Department will utilize this additional capacity to transport two additional water transfers totalling 66,000 acre feet: (1) the State Drought Emergency Water Bank (50,000 acre feet); and (2) the Placer County Water Agency (16,000 acre feet).

The combination of current storage, expected runoff and water transfers is sufficient to allow the Department to recommend a return to a 25% rationing program. The adoption of this program would, in effect, return all customers, including Suburban Resale Customers, to their pre-April 1, 1991 allocations. Current conditions are similar to those of April 1990 when rationing was imposed at the 25% level requiring reductions of 10% on inside use and 60% on outside use.

B. RATIONING PLAN OBJECTIVES

The objective of any rationing plan is to meet essential water supply needs, to minimize hardship on residential customers and businesses, and to provide an equitable distribution of available water supplies throughout the service area. The suggested rationing plan presented to the Public Utilities Commission applies to all retail and wholesale customers.

II. WATER USE RESTRICTIONS

In a mandatory rationing program, water use restrictions serve as a significant means of generating water savings. The following use restrictions (A - I) were applied in both the 1988 and 1990 rationing programs to all customers served within the City and County of San Francisco and those customers outside the City and County served directly by San Francisco.

- A. Water waste, including but not limited to, any flooding or runoff into the street or gutters, is prohibited.
- B. Hoses shall not be used to clean sidewalks, driveways, patios, plazas, homes, businesses, parking lots, roofs, awnings or other hard surface areas.
- C. Hoses used for any purpose must have positive shutoff valves.
- D. Restaurants shall serve water to customers only upon request.
- E. Potable water shall not be used to clean, fill or maintain levels in decorative fountains. The use of groundwater is permitted.
- F. Additional water will not be allowed for new landscaping or expansion of existing facilities unless low water use landscaping designs and irrigation systems are employed.
- G. Water service connections for new construction shall be granted only if water saving fixtures or devices are incorporated into the plumbing system.
- H. Use of potable water for consolidation of backfill, dust control or other non-essential construction purposes is prohibited. The use of groundwater and/or reclaimed water is permitted when approved by the Department of Health.
- I. Irrigation of lawns, playfields, parks, golf courses, cemetaries, and landscaping of any type with potable water shall be reduced by at least the amount specified for outside use in the adopted rationing plan.

Additional water use restrictions were adopted for all customers served within the City and County of San Francisco and those customers outside the City and County served directly by San Francisco in the 1991 rationing program.

Various of these restrictions (J - N) are recommended for continuation during the balance of the recommended 25% mandatory rationing program.

- J. Verified water waste as determined by the Department will serve as prima facie evidence that the allocation assigned to the water account is excessive; therefore the allocation will be subject to review and possible reduction, including termination of service.
- K. Water used for all cooling purposes must be recycled.

- L. The use of groundwater and/or reclaimed water for the irrigation of golf courses and similar turf areas is strongly encouraged when approved by the Department of Public Health.
- M. The use of groundwater and/or reclaimed water for the irrigation of median strips is strongly encouraged when approved by the Department of Public Health.
- N. The use of groundwater and/or reclaimed water for street sweepers/washers is strongly encouraged when approved by the Department of Public Health.

Finally, the Public Utilities Commission strongly recommends to all its Suburban Resale customers and political entities which they serve to adopt these restrictions or similar restrictions that will achieve the same or greater results.

III. RECOMMENDED PLAN FOR ADOPTION

Based on available water in storage, anticipated divertable runoff and water transfers from the State Drought Emergency Water Bank and the Placer County Water Agency, the following mandatory rationing program is recommended to the Public Utilities Commission for adoption.

The intent of this rationing program is to reduce system-wide demand by 25% compared to 1987 water use. The plan governs all water customers served by the San Francisco Water Department.

The following allocation plan governs all water customers served by the San Francisco Water Department. The plan is based on prior water use by individual customers with calendar 1987 used as the base year. Customers who do not have a 1987 consumption history or who have appealed their allocations, will have an allocation based on a per capita methodology.

City and County of San Francisco

These allocations govern customers served within the City and County of San Francisco and customers outside the City and County served directly by San Francisco.

Inside Use. For bi-monthly accounts the allocation for each billing period for inside use will be 90% of the average consumption for billing periods ending in January, February, March and December, 1987. For monthly accounts the allocation for each billing period will be 90% of the average consumption for the four billing periods ending in the above months.

Outside Use. For all accounts the allocation for outside use for billing periods ending in April through November, will be 40% of the difference between the average consumption calculated for inside use and actual consumption for the same period in 1987.

Total Allocation. The allocations for each billing period will be the total of the allocations for inside and outside use.

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Allocations For New Accounts

Initial allocations for new residential accounts will be established on a per capita basis. In the case of commercial or industrial accounts, allocations will be established on the basis of business data supplied to the Department.

Water Use Restrictions

Water use restrictions, as modified, shall remain in effect with the implementation of this plan. Violation of any water use restriction by any customer may, after one written warning and in accordance with all applicable laws and legal restrictions, result in the installation of a flow restricting device in the service line of the customer; continued violation may result in the termination of water service. The customer shall bear the cost of the enforcement action.

Excess Use Charge

The current excess use charge structure contained in the Department's Rate Schedules for Water Service shall remain in effect. In addition, two consecutive excess use charges may result in the installation of a flow restricting device in the service line of the customer. A third consecutive excess use charge may result in the termination of water service.

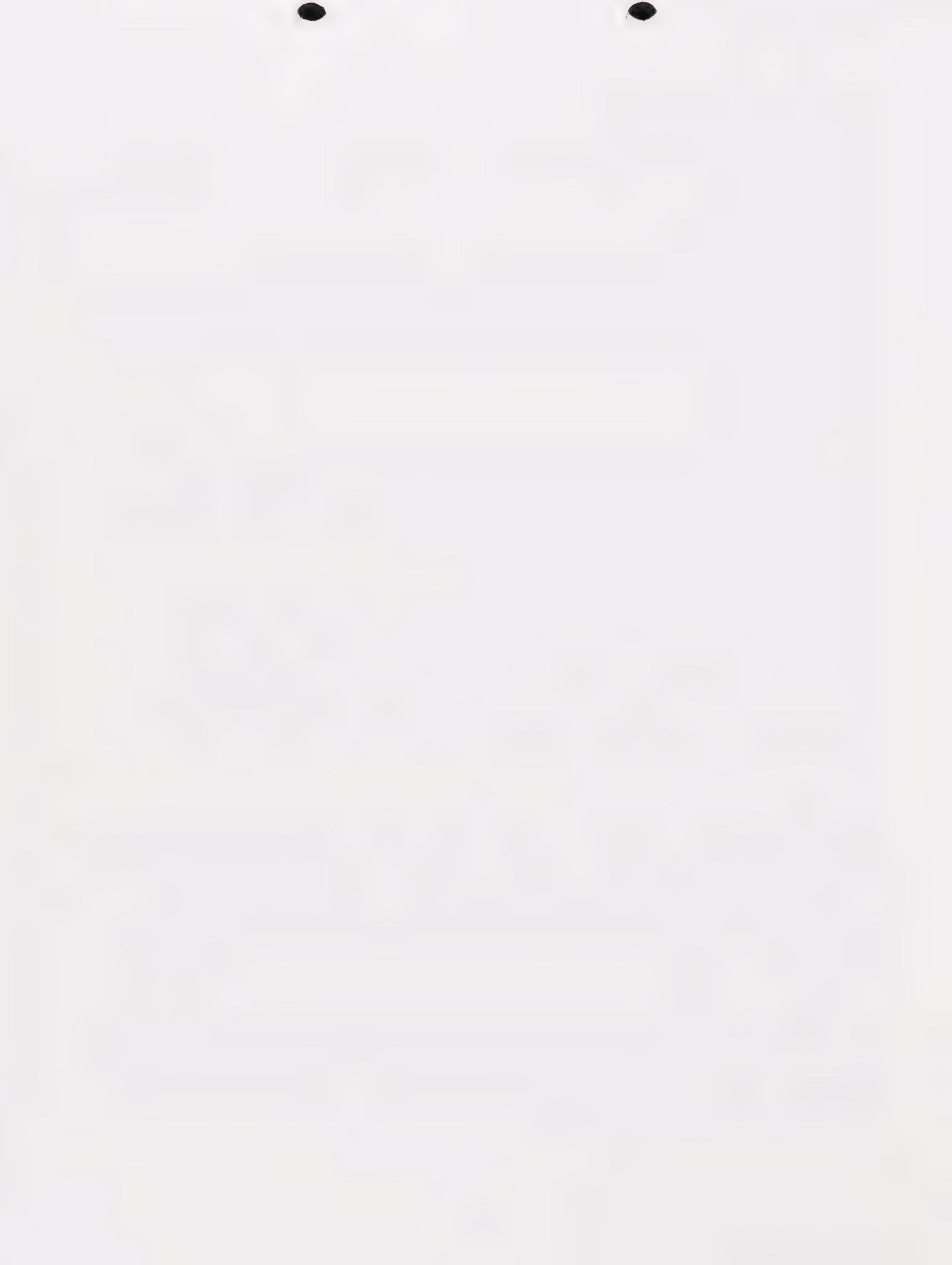
Mandatory Conservation Inspections

Mandatory on-site inspections may be required of large water consumers, installations not internally metered (i.e. master-metered facilities), facilities where there is a reasonable indication of water waste or whenever necessary to determine the appropriate allocation for a water service account. Failure to permit such an inspection shall result in service restriction or termination of service. Leaks identified pursuant to such inspection not repaired within 30 days may result in a 10% allocation reduction and/or termination of water service.

Suburban Resale Customers

The Suburban Resale customers in total shall receive an annual allocation of water based on the same inside/outside formula that will be used for the City and County of San Francisco. Monthly allocations for each Suburban Resale customer have been proposed which collectively add up to the total annual allocation and which distribute water equitably to all wholesale customers. Customers purchasing water for resale are strongly encouraged to adopt water usage restrictions and enforcement programs similar to those employed in San Francisco.

Banking. Banking provisions will allow water savings below allotments in any month to be applied against water use above allotments in any month to meet special circumstances inherent in the operating conditions of the resale customers. Failure to pay excess use charges in a timely manner that are not protested in writing may result in the rescission of banking provisions of individual Suburban Resale customers.



Exceptions to Annual Allocations. Adjustments for growth will be made only to the effect that increases are offset against the total Suburban Resale customers' annual allocation.

Service to the Cities of San Jose and Santa Clara. Consistent with the Commission action taken during the previous water shortage emergency, the Cities of San Jose and Santa Clara have been included in the Suburban Resale Customer Allocation Plan. These two cities, under the terms of existing contracts with the Water Department, are classified as purchasing water on a temporary and interruptible basis. While interruption of service to these cities is not recommended in 1991, a worsening of the water supply situation in 1992, however, may require a recommendation by the Water Department to the Public Utilities Commission to temporarily interrupt service to both San Jose and Santa Clara.

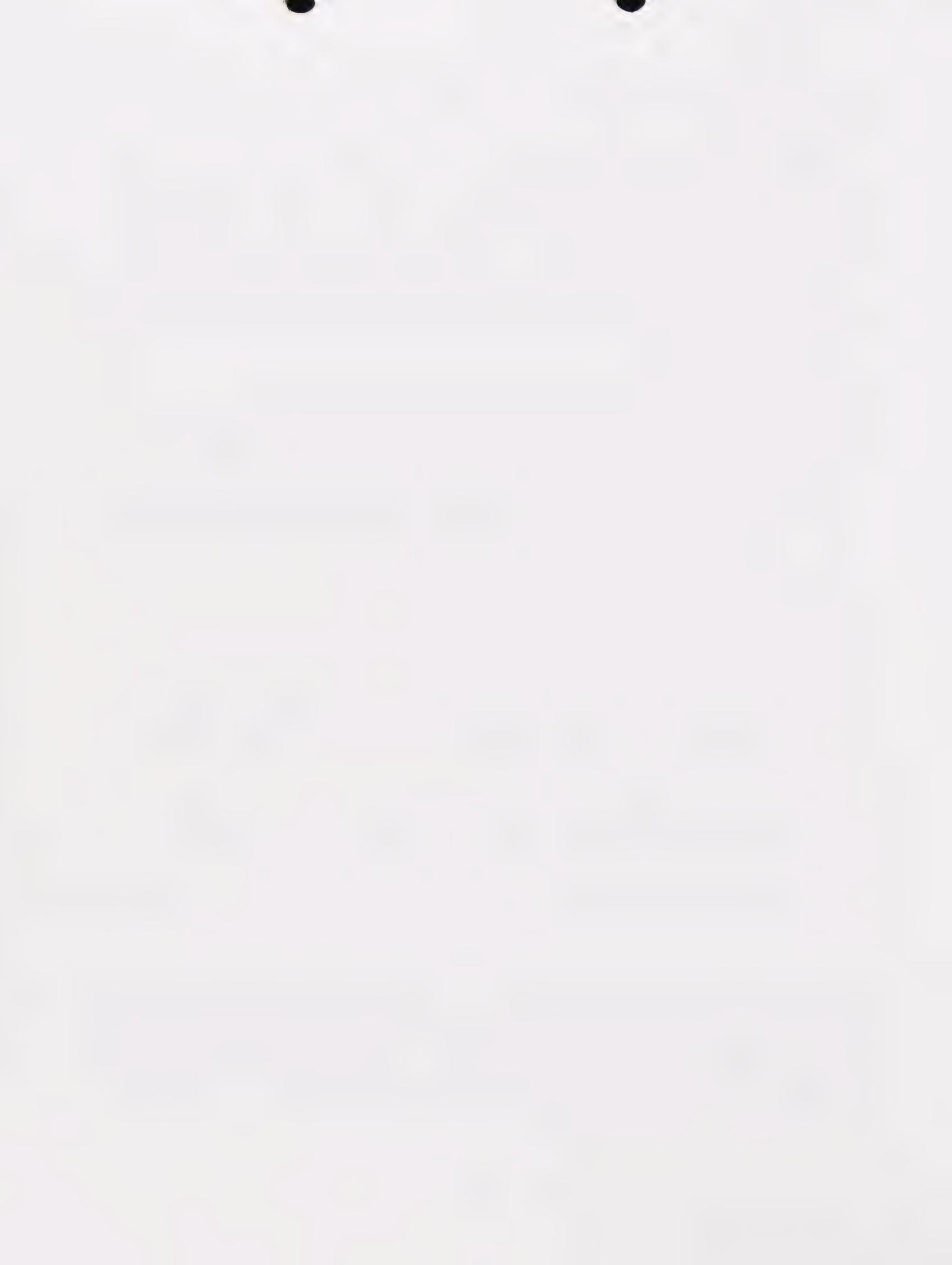
EXCEPTIONS TO RATIONING ALLOCATIONS OR WATER USE RESTRICTIONS

Exceptions to rationing allocations or water use restrictions inside San Francisco may be made for the protection of public health or safety. Any exceptions are subject to the following requirements and procedures:

1. In the case of a rationing allocation, it must be shown that the allocation is not sufficient to meet public health or safety needs. In the case of water use restrictions, it must be shown that there are no alternatives to the use of water.
2. Water used under this exception procedure must be efficiently used without waste.
3. Appeals must be in writing to the Water Rationing Administrator, P. O. Box 7466, San Francisco, CA 94120.
4. Appeals of rationing allocations determined to contain false information may result in a reduction in the allocation and the installation of a flow restricting device in the service line of the customer.
5. Approval of appeals may require verification that all appropriate conservation measures are in place and may require an on-site conservation inspection prior to approval.
6. Denials may be appealed to the General Manager of the Water Department whose decision will be final.

IV. BUDGET REQUIREMENTS

Program funding for the balance of the 1991 fiscal year is contained in the 1990/91 budget. Funding has also been included in the 1991/92 budget request adopted by the Public Utilities Commission at its meeting of February 12, 1991. Although Such funding was predicated on the continuation of the program at the 25% rationing level already in place, a supplemental budget request for the 1991/92 fiscal year budget will be submitted and serves as a companion measure to this rationing program.



V. IMPLEMENTATION SCHEDULE

Should the Public Utilities Commission adopt the recommended mandatory rationing program at the public hearing on April 23, 1991, the following timetable will apply:

- 04/23/91 Modified water use restrictions become effective
- 04/01/91 Allocations become effective retroactive to 04/01/91
- 05/15/91 Written notification of new allocations to all customers
- 07/01/91 New conservation related rates become effective for meter readings on and after 07/01/91 (water used in May and June)

VI. PER CAPITA METHODOLOGY

Per Capita

The general premise of the recommended proposed 25% mandatory rationing program is based in the concept of a percentage reduction of consumption from a 1987 base year. Questions of equity have been raised concerning the utilization of this allocation methodology with some discussion as to the use of a per capita methodology as a more equitable means of distributing the rationing effort.

While it is still accurate to state that the recommended program is based on a percentage reduction, what is not generally understood is that a substantial portion of the residential accounts, both single and multi-family, have current allotments based on a per capita methodology. In fact, 46% of the total single-family (49,000 out of 106,000) and 41% of the multi-family accounts (15,000 out of 35,000) reflect occupancy data for one of the two following reasons: (1) The customer came on to the account after 1987, lacked 1987 consumption history and provided information as to the number of occupants in the residence; or (2) Appeals granted during the 1988, 1990 or 1991 rationing programs were based primarily on a change in the number of occupants in a residence. Overall, 45% of all residential account allocations are currently based on a per capita methodology.

Should the Public Utilities Commission adopt the recommended 25% rationing program and require that it go into effect immediately, the Department would continue to use the hybrid rationing system comprised of both percentage reductions and occupancy as the basis for the immediate implementation of the program. To convert all residential allocations to a per capita basis would entail conducting a census. This would result in a lengthy delay, causing significant impacts on the administration of the program and on customers' ability to respond to the current rationing requirements. Time lost in the implementation of this program would obviously have a significantly adverse affect on the program's ability to reduce water consumption and could result at a later date in an increased level of rationing to offset reductions not achieved during the transition period.

Future water supply status may dictate continuation of a rationing program at the same, increased or reduced level. The Water Department has committed to the development of a rationing program utilizing a per capita methodology when feasible, or if a higher level of mandatory rationing becomes necessary. Work will begin to develop a program which would provide the Department with the data necessary to develop such a program. Collection of data would be designed to provide for ease of implementation by the Department and convenience to the individual customers providing the information. Such a program would be presented to the Public Utilities Commission at a future date so that the Commission and the Department's customers understand what the mechanism for future implementation would be.

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